

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CureIS Healthcare, Inc.,

Plaintiff,

v.

Epic Systems Corporation,

Defendant.

Case No.: 3:25-cv-04108-MMC

**DECLARATION OF LAUREN A.
MOSKOWITZ IN SUPPORT OF
DEFENDANT EPIC SYSTEMS
CORPORATION'S MOTION TO
TRANSFER VENUE**

I, Lauren A. Moskowitz, declare as follows:

1. I am a partner at Cravath, Swaine & Moore LLP and counsel to Defendant Epic Systems Corporation ("Epic") in the above-captioned case. I am a member in good standing of the bar of the State of New York, and have been admitted *pro hac vice* in this case.

2. I make this declaration in support of Epic's motion to transfer venue to the Western District of Wisconsin pursuant to 28 U.S.C. § 1404(a). Except as otherwise indicated, I have personal knowledge of the facts stated herein and could testify competently thereto if called to do so in this matter.

3. Attached hereto as **Exhibit A** is a true and complete copy of CureIS Healthcare, Inc.'s ("CureIS") business record details, as printed from the Office of the Minnesota Secretary of State's website (<https://www.sos.mn.gov/>) on June 15, 2025.

4. Attached hereto as **Exhibit B** is a true and complete copy of the LinkedIn page for Bret Randolph, CureIS's Chief Operating Officer, as printed from the LinkedIn website (www.linkedin.com) on June 15, 2025.

5. Attached hereto as **Exhibit C** is a true and complete copy of the docket as of June 15, 2025 for *Particle Health Inc. v. Epic Systems Corporation*, No. 1:24-cv-07174-NRB (S.D.N.Y.).

6. Attached hereto as **Exhibit D** is a true and complete copy of [REDACTED] 2024 Statement of Information filed with the State of California Office of the Secretary of State, as printed from the California Secretary of State website (<https://secretaryofstate.com/california>) on June 15, 2025.

7. Attached hereto as **Exhibit E** is a true and complete copy of [REDACTED] 2025 Statement of Information filed with the State of California Office of the Secretary of State, as printed from the California Secretary of State website (<https://secretaryofstate.com/california>) on June 15, 2025.

8. Attached hereto as **Exhibit F** is a true and complete copy of a Google Maps route, as printed on June 15, 2025 between CureIS's principal place of business in Woodbury, Minnesota and Hudson, Wisconsin, a town within St. Croix County, Wisconsin.

9. Attached hereto as **Exhibit G** is a true and correct copy of the CureIS's press kit, as printed from CureIS's website (www.cureis.com) on June 15, 2025.

10. Attached hereto as **Exhibit H** is a true and correct copy of the excerpted Northern District of California and Western District of Wisconsin statistics from the U.S. District Courts—Combined Civil and Federal Court Management Statistics (March 31, 2025), as printed from the U.S. courts website (<https://www.uscourts.gov/data-news/reports/statistical-reports/federal-court-management-statistics/federal-court-management-statistics-march-2025>) on June 15, 2025.

I DECLARE, under penalty of perjury, that the foregoing is true and correct.

Dated this 17th day of June, 2025.

/s/ Lauren A. Moskowitz

Lauren A. Moskowitz